

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JIRIES ABU-JOUDEH,

Plaintiff,

No.: 2:16-cv-13893

Vs.

HON. ROBERT H. CLELAND
Mag. Elizabeth A. Stafford

HEATHER SCHNEIDER,
RICK SEBRING, SCOTT SHEETS,
MICHAEL EDWARDS, PATRICK LEAVECK,
and BEST RECOVERY SERVICES, LLC,

Defendants.

BEN M. GONEK (P43716)
Law Offices of Ben M. Gonek, PLLC
Attorney for Plaintiff
500 Griswold Street, Ste. 2450
Detroit, MI 48226
(313) 963-3377
ben@goneklaw.com

JOHN J. GILLOOLY (P41948)
Garan Lucow Miller, P.C.
Attorney for Defendant Schneider
1155 Brewery Park Blvd., Ste. 200
Detroit, MI 48207-2641
(313) 446-5501
jgillooly@garanlucow.com

LORI I. BOMMARITO (P57465)
Zolton Law Offices
Attorney for Defendants Edwards,
Leaveck and Best Recovery Services
6420 Normandy Drive
Saginaw, MI 48638
(989) 792-1111
ibommarito@zoltonlaw.com

ALEXANDER D. BOMMARITO
(P62704)
Bommarito Law Offices, PLLC
Co-Counsel for Defendants Edwards,
Leaveck and Best Recovery Services
143 S. 1st Street, P.O. Box 189
Freeland, MI 48623
(989) 573-5300
adb@freelandlaw.net

Adam P. Sadowski (P73864)
John G. Fedynsky (P65232)
Patrick Myers (P81444)
Assistant Attorneys General
Attorneys for Defendant Sebring
Civil Litigation, Employment &
Elections Division
P.O. Box 30736
Lansing, MI 48909 (517) 373-6434
fedynskyj@michigan.gov
sadowskia@michigan.gov
Myersp4@michigan.gov

JAMES E. TAMM (P38154)
MICHAEL BONVOLANTA (P80038)
O'Connor, DeGrazia, Tamm &
O'Connor, P.C.
Attorney for Defendant Scott Sheets
40701 Woodward Avenue, Ste. 105
Bloomfield Hills, MI 48304
(248) 433-2000
jetamm@odtlegal.com

**DEFENDANT SCOTT SHEETS' *EX PARTE* MOTION FOR LEAVE TO
FILE EXHIBIT IN THE TRADITIONAL MANNER**

NOW COMES the undersigned Michael J. Bonvolanta, attorney for Defendant, **SCOTT SHEETS**, and pursuant to the Electronic Filing Policies and Procedures, seeks leave of this Court to file an exhibit in the traditional manner.

The exhibit to Defendant Scott Sheets' Motion for Summary Judgment cannot be authentically converted to electronic form for the following reasons: the exhibit to Defendant Scott Sheets' Motion for Summary Judgment is a CD of a 911 call. The foregoing cannot be adequately converted to a format acceptable for filing electronically without jeopardizing the accuracy and quality of the recordings.

For the foregoing reason, the undersigned respectfully requests that this Honorable Court grant the leave sought in this Motion.

Respectfully submitted,

O'CONNOR, DeGRAZIA, TAMM & O'CONNOR, P.C.

By: /S/ Michael J. Bonvolanta

JAMES E. TAMM (P38154)

MICHAEL J. BONVOLANTA (P80038)

Attorney for Defendant Scott Sheets

40701 Woodward Avenue, Ste. 105

Bloomfield Hills, MI 48304

(248) 433-2000/(248) 433-2001 Fax

jetamm@odtlegal.com

mjbonvolanta@odtlegal.com

DATED: August 14, 2018

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JIRIES ABU-JOUDEH,

Plaintiff,

No.: 2:16-cv-13893

Vs.

HON. ROBERT H. CLELAND
Mag. Elizabeth A. Stafford

HEATHER SCHNEIDER,
RICK SEBRING, SCOTT SHEETS,
MICHAEL EDWARDS, PATRICK LEAVECK,
and BEST RECOVERY SERVICES, LLC,

Defendants.

BEN M. GONEK (P43716)
Law Offices of Ben M. Gonek, PLLC
Attorney for Plaintiff
500 Griswold Street, Ste. 2450
Detroit, MI 48226
(313) 963-3377
ben@goneklaw.com

JOHN J. GILLOOLY (P41948)
Garan Lucow Miller, P.C.
Attorney for Defendant Schneider
1155 Brewery Park Blvd., Ste. 200
Detroit, MI 48207-2641
(313) 446-5501
jgillooly@garanlucow.com

LORI I. BOMMARITO (P57465)
Zolton Law Offices
Attorney for Defendants Edwards,
Leaveck and Best Recovery Services
6420 Normandy Drive
Saginaw, MI 48638
(989) 792-1111
ibommarito@zoltonlaw.com

ALEXANDER D. BOMMARITO
(P62704)
Bommarito Law Offices, PLLC
Co-Counsel for Defendants Edwards,
Leaveck and Best Recovery Services
143 S. 1st Street, P.O. Box 189
Freeland, MI 48623
(989) 573-5300
adb@freelandlaw.net

Adam P. Sadowski (P73864)
John G. Fedynsky (P65232)
Patrick Myers (P81444)
Assistant Attorneys General
Attorneys for Defendant Sebring
Civil Litigation, Employment &
Elections Division
P.O. Box 30736
Lansing, MI 48909 (517) 373-6434
fedynskyj@michigan.gov
sadowskia@michigan.gov
Myersp4@michigan.gov

JAMES E. TAMM (P38154)
MICHAEL BONVOLANTA (P80038)
O'Connor, DeGrazia, Tamm &
O'Connor, P.C.
Attorney for Defendant Scott Sheets
40701 Woodward Avenue, Ste. 105
Bloomfield Hills, MI 48304
(248) 433-2000
jetamm@odtlegal.com

**ORDER GRANTING *EX PARTE* MOTION FOR LEAVE TO FILE
EXHIBIT IN THE TRADITIONAL MANNER**

This matter is before the Court on Defendant Scott Sheets' *Ex Parte* Motion for Leave to File in the Traditional Manner an exhibit in support of Defendant Scott Sheets' Motion for Summary Judgment. The Court has reviewed Defendant's Motion and finds that it should be granted.

Accordingly, it is **ORDERED** that Defendant Scott Sheets' *Ex Parte* Motion for Leave to File an Exhibit in the Traditional Manner is **GRANTED**. Defendant Scott Sheets shall file a copy of the exhibit with the Clerk's office as required by the Court's CM/ECF Filing Policies and Procedures, and shall submit a second copy of the exhibit to the Court in chambers.

S/Robert H. Cleland
ROBERT H. CLELAND
UNITED STATES DISTRICT JUDGE

Dated: August 14, 2018

I hereby certify that a copy of the foregoing document was mailed to counsel of record and/or pro se parties on this date, August 14, 2018, by electronic and/or ordinary mail.

S/Lisa Wagner
Case Manager and Deputy Clerk
(810) 292-6522

CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2018 I electronically filed the foregoing paper(s) with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record and I hereby certify that I have mailed by United States Postal Service the Paper(s) to the following non-ECF participants: None.

/S/ Jemmis F. Lawrence (jflawrence@odtlegal.com)
40701 Woodward Avenue, Ste. 105
Bloomfield Hills, MI 48304
(248) 433-2000
James E. Tamm (P38154)
Michael J. Bonvolanta (P80038)
jetamm@odtlegal.com
mjbonvolanta@odtlegal.com